

ALBERTINA M. AMENDOLA, ESQ.

Attorney ID: 008081992

JUDD SHAW, P.A.

JUDD SHAW INJURY LAW

1161 Broad Street, Suite 312

Shrewsbury, New Jersey 07702

732-888-8888

Attorney for Plaintiff

CHERYLEE CRAWFORD

Plaintiff,

v.

WALMART OF BRICK; ABC Corporations
(1-10), DEF Partnerships (1-10), GHI Limited
Liability Companies (1-10), and John/Jane
Does (1-10),

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - OCEAN COUNTY

DOCKET NO: OCN-L-

CIVIL ACTION

**COMPLAINT, JURY DEMAND,
DESIGNATION OF TRIAL COUNSEL
AND CERTIFICATION**

Plaintiff, CHERYLEE CRAWFORD, currently residing at 366 Kentwood Boulevard, Brick,
New Jersey, 08724 by way of Complaint, states:

FIRST COUNT
(NEGLIGENCE)

1. On or about August 22, 2020, Plaintiff, CHERYLEE CRAWFORD, was a patron and
lawfully on the premises commonly known as WALMART OF BRICK (hereinafter "WALMART")
located at 1872 Route 88 in Brick, New Jersey.

2. At all times relevant herein Defendant, WALMART of BRICK, owned, occupied, operated, and/or maintained the business located at the premises commonly known as WALMART OF BRICK, located at 1872 Route 88 in Brick, New Jersey.

3. At all times relevant herein Defendants, ABC CORPORATIONS (1-10), DEF PARTNERSHIPS, (1-10), GHI LIMITED LIABILITY COMPANIES (1-10) and JOHN/JANE DOES (1-10), owned, occupied, operated, and/or maintained the business located at the premises commonly known as WALMART OF BRICK, located at 1872 Route 88 in Brick, New Jersey.

4. Said Defendants, through agents, servants and/or employees of the Defendant, did so negligently and carelessly act in a manner so as to cause a dangerous condition to exist thereon resulting in Plaintiff, CHERYLEE CRAWFORD, being injured.

5. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff was caused to be injured due to the aforesaid dangerous condition and was thus caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians and medication and has been and will in the future continue to be hampered in her daily routine.

WHEREFORE, Plaintiff, CHERYLEE CRAWFORD, demands judgment against the named Defendants, as well as ABC Corporations (1-10), DEF Partnerships (1-10), GHI Limited Liability Companies (1-10), and John/Jane Does (1-10) jointly, severally or in the alternative in the amount of her damages together with interest and costs of suit.

Dated: January 25, 2021

JUDD SHAW INJURY LAW

By: /s/ Albertina M. Amendola
ALBERTINA M. AMENDOLA, ESQ.

CERTIFICATION PURSUANT TO R. 4:5-1

I hereby certify that the matter controversy is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I further certify that there is/are no other parties who should be joined in the within action.

Dated: January 25, 2021

JUDD SHAW INJURY LAW

By: /s/ Albertina M. Amendola
ALBERTINA M. AMENDOLA, ESQ.

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17(b), the Plaintiff hereby demands that the Defendants provide answers to the Uniform Interrogatories as set forth in Form C and C(2) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to R. 4:25-4, Albertina M. Amendola, Esq., is hereby designated as Trial Counsel in this matter.

JURY DEMAND

Plaintiff hereby demands a jury trial as to each and every issue in this action.

DATED: January 25, 2021

JUDD SHAW INJURY LAW

By: /s/ Albertina M. Amendola
ALBERTINA M. AMENDOLA, ESQ.

Civil Case Information Statement

Case Details: OCEAN | Civil Part Docket# L-000205-21

Case Caption: CRAWFORD CHERYLEE VS WALMART
OF BRICK

Case Initiation Date: 01/25/2021

Attorney Name: ALBERTINA MARIE AMENDOLA

Firm Name: JUDD B. SHAW, P.A.

Address: 1161 BROAD ST STE 312
SHREWSBURY NJ 07702

Phone: 7328888888

Name of Party: PLAINTIFF : Crawford, Cherylee

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Cherylee Crawford? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

01/25/2021
Dated

/s/ ALBERTINA MARIE AMENDOLA
Signed